

# KLAYMAN LAW GROUP

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**VIA CM/ECF and Email**

Hon. Andrew L. Carter, Jr.  
U.S. District Court for the Southern District of New York  
40 Foley Square  
New York NY 10007

**Re: Consent Motion for Extension of Time in *Moore, et al v. Cohen, et al.*, 1:19-cv-4977**

Dear Judge Carter,

We represent Plaintiffs Roy Moore and Kayla Moore (“Plaintiffs”) in this case. Pursuant to Rule 1(D) of this Court’s Individual Practices, Plaintiffs move for a 14-day extension of time, until and including October 29, 2019 to file a response to Defendants’ Motion to Dismiss. The original due date for this response is October 15, 2019, and no previous requests for extension have been made by Plaintiffs.

Counsel for Defendants have consented to Plaintiffs’ motion on the condition that they also be granted an extension of time until and including November 19, 2019 to file any reply. Plaintiffs consent to this as well.

Respectfully Submitted,

/s/ Larry Klayman \_\_\_\_\_  
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Attorney for Plaintiffs *Pro Hac Vice*

Cc: Defendant’s counsel (via CM/ECF and email)